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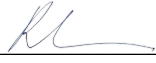
September 20, 2023

VIA EEC

The Honorable Ronnie Abrams
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
September 21, 2023

Re: **United States v. Michael Wilbon, 23 Cr. 52 (RA)**

Dear Judge Abrams:

We represent Mr. Michael Wilbon in the above-captioned matter. Yesterday, counsel for Defendant Francis Shane submitted a motion to dismiss Count 7 of the Indictment. We regret not spotting this issue prior to yesterday's submission, and not counseling our client on the matter prior to the motions' deadline. We request an extension until September 29 to alert the Court if Mr. Wilbon will be joining in Defendant Shane's motion. The extra time is needed to ensure we have an opportunity to counsel Mr. Wilbon, who is incarcerated, on the motion. We do not expect this request to affect the Court's briefing schedule, as we would not be submitting papers supplemental to Defendant Shane's motion. We have sought the Government's position on our motion, but due to AUSA Katherine Cheng's being on trial, have yet to hear a response.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Michael W. Martin

Ian Weinstein

Lincoln Square Legal Services, Inc.

Attorneys for Mr. Michael Wilbon

cc: All Parties via ECF